

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

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REBECCA BROWN, et al.,	)	
	)	
Plaintiffs,	)	
	)	
v.	)	Case No. 2:20-cv-00064-MJH-LPL
	)	
TRANSPORTATION SECURITY	)	
ADMINISTRATION, et al.,	)	
	)	
Defendants.	)	
	)	

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**CONSENT MOTION TO EXTEND TIME TO FILE ANSWER**

Defendants Transportation Security Agency (“TSA”), TSA Administrator David P. Pekoske, the Drug Enforcement Administration (“DEA”), DEA Acting Administrator D. Christopher Evans, and the United States of America (together, the “Government Defendants”), by and through undersigned counsel, respectfully move for a 30-day extension of time, from April 13, 2021, to May 13, 2021, to file their answer to Plaintiffs’ complaint following the Court’s denial in part of the Government Defendants’ motion to dismiss. Plaintiffs consent to this request.

1. On March 30, 2021, the Court issued an order denying the Government Defendants’ motion to dismiss with respect to Counts I-III of the Plaintiffs’ first amended complaint. (ECF No. 79).

2. Pursuant to Rule 12(a)(4)(A) of the Federal Rules of Civil Procedure, the Government Defendants’ answer is now due on April 13, 2021.

3. Plaintiffs’ first amended complaint is over 100 pages long. Due to the length and

complexity of Plaintiffs' complaint, and the press of business faced by undersigned counsel in other cases, the Government Defendants respectfully request a 30-day extension of time, from April 13, 2021 to May 13, 2021, to file their answer.

4. This is the Government Defendants' first request for an extension of time to file their answer following the Court's denial of their motion to dismiss. Plaintiffs consent to this request.

Dated: April 12, 2020

Respectfully submitted,

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/s/ Elizabeth Tulis  
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